

BROWN & ROSEN LLC

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August 9, 2025

Hon. Robert Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Webber, et al. v. Dash, et al
DOCKET NO. 1:19-cv-610-RWL

Dear Hon. Judge Lehrburger:

This office is counsel to the Plaintiffs Josh Webber (“Webber”) and Muddy Water Pictures LLC d/b/a Muddy Water Pictures, Inc. (“Muddy”) (collectively “Plaintiffs”) in this matter. Pursuant to this Court’s order at Docket Entry 476, Plaintiffs update the status report filed yesterday, at Docket Entry 477.

After Plaintiffs filed their letter report at Docket Entry 477 on August 8, 2025, the Defendants provided Plaintiffs with two (2) links to the films (1) “Honor Up” and (2) “Too Honorable.” Plaintiffs are reviewing the films for rendering, distribution quality and accuracy to determine if it is the same versions and specifications presently being distributed by Black Entertainment Television (“BET”).

Defendants remain in violation of the Court’s order relating to the copyright “Mr. Untouchable” which has not been assigned to the US Marshal. Upon conference with Attorney Bhushan on August 8, 2025, Attorney Bhushan has indicated that it was a clerical error, and a supplemental assignment will be completed by Mr. Dash by August 13, 2025 relating to the film “Mr. Untouchable”.

Defendants have also provided a letter supposedly mailed to the US Copyright Office requesting copies of depository copyrights and costs of obtaining the copies. The defendants have not paid for the depository copies as of yet and there is no indication as to when the depository copies will be provided by the US Copyright Office. Plaintiffs may need to file a motion to amend this Court’s order at Docket Entry 472-Auction Order- to obtain more time to sell the assets of the Defendants in light of this unexpected delay.

Another issue has arisen in regard to Bluroc LLC d/b/a Bluroc Records (“Bluroc”) as more information is needed to convey to the US Marshal relating to the assets of

Bluroc once the company is sold at public auction. Plaintiffs need a complete list of assets and the location of Bluroc's bank account holding the revenue/profits for music sales. See Exhibit 1. The winning bidder at the public auction will be entitled to the assets, as 100 percent ownership of Bluroc has been transferred to the US Marshal.

In light of the current disposition and the additional belated partial compliance by the defendants, in lieu of the issuance of an arrest warrant, Plaintiffs respectfully request that an Order enter mandating that Mr. Dash (1) provide a complete list of musical assets of Bluroc and (2) provide the banking information of Bluroc, to the Plaintiffs by August 13, 2025. Plaintiffs also request an Order mandating that the film "Mr. Untouchable" be assigned to the US Marshal as indicated in the stipulation at Docket Entry 463, by August 13, 2025. Attorney Bhushan has indicated the Defendants' intent to fully cooperate and provide additional information as needed.

This letter has been conferenced with Attorney Bhushan and he has no objection.

Sincerely,
Brown & Rosen LLC
Christopher Brown
Christopher L. Brown

EXHIBIT 1

BROWN & ROSEN LLC

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August 7, 2025

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RE: RE: Webber v. Dash, et al
DOCKET NO. 1:19-cv-610

Dear Attorney Bhushan:

As you are aware, I am counsel to Muddy Waters Pictures and Josh Webber (collectively “Webber”). The interests of Bluroc LLC d/b/a Bluroc Records (“Bluroc”) has been assigned to the US Marshal for public auction. Several musical assets relating to Bluroc appear as Exhibit A and will be identified as the assets of Bluroc in the auction.

As this time, I need all of the logins at Apple, Amazon, iTunes, Youtube, Tidal, etc., to provide to the US Marshal who will need the information for the upcoming public auction. I will also need the bank account(s) information for Bluroc to provide to the US Marshal as the winning bidder at the auction will need access and will be the new owner of Bluroc. Please send me the information and a complete list of all the Bluroc assets by August 11, 2025.

Brown & Rosen LLC

By:

Christopher Brown

Christopher L. Brown

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1	365	02:46	E	\$0.99
2	I Just Realized (f...	03:29	E	\$0.99
3	We Don't Play	03:03	E	\$0.99
4	Recession Proof	07:35	E	\$0.99
5	Rock the Mic	03:59	E	\$0.99
6	We Never Do What T...	03:27	E	\$0.99

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4	Recession Proof	07:35	E	\$0.99
5	Rock the Mic	03:59	E	\$0.99
6	We Never Do What T...	03:27	E	\$0.99
7	Flipside	04:54	E	\$0.99
8	We Dangerous	07:59	E	\$0.99
9	Night Shift	04:26	E	\$0.99
10	What We Do	02:56	E	\$0.99
11	Kill My Vibe	06:07	E	\$0.99

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1	Forget Your Man	E	02:16		<div>\$1.29</div>

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The Black Guns >

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1 Song
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1	You're So Fine (feat. Nicky Li...	02:57		<div>\$1.29</div>

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1	Playtoy	E	01:44		\$0.99
2	Out of Control	E	02:12		\$0.99
3	Walk Me To My Car	E	03:01		\$0.99
4	Another Round	E	02:48		\$0.99
5	Goons (feat. Damon Dash)	E	03:22		\$0.99
6	No Trouble	E	03:36		\$0.99
7	Focus	E	02:51		\$0.99
8	Sober	E	03:22		\$0.99

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8

Window Shopping (... E

05:15

\$1.29

9

Warrior (feat. Nicolette) [... E

02:24

\$1.29

10

Eat What I Kill (Live) E

04:14

\$1.29

11

That Rocks (Live) E

05:30

\$1.29

12

Dna (feat. Eddie Melt... E

03:18

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Redemption - Single E

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	NAME		DURATION	POPULARITY	PRICE
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Line Em Up (feat. Nicky Licky) - Single E

The Black Guns >

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